# *Lessons Learned: Integrating EMS and Environmental Compliance Auditing*

## *2009 Environmental, Energy & Sustainability Symposium*

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**U.S. Army Environmental Command**
**6 May 2009**

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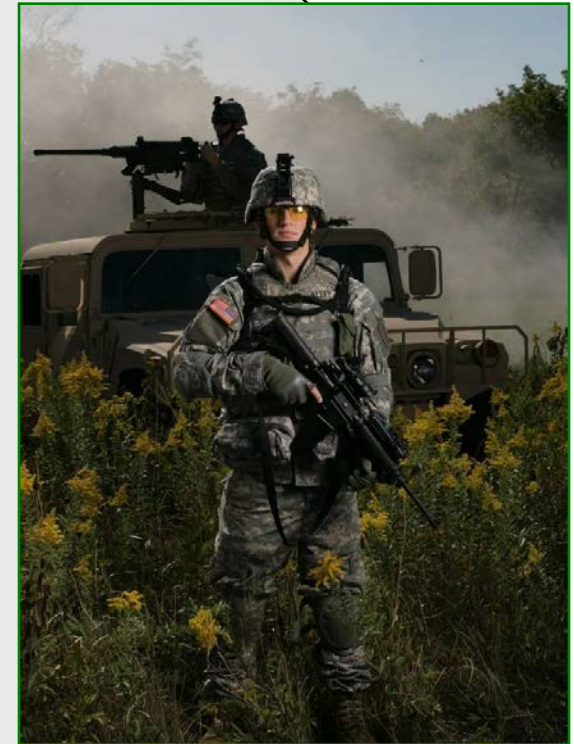
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# Environmental Performance Assessment System (EPAS)

## Program Value

- **Provide status of installation environmental compliance and management systems to Garrison Commanders**

- **Provide Command emphasis to environmental programs and management systems**

- **Ensure management system is complete and effective**

- **Provide input to Army environmental trends and identification of systemic problems**

- **Professional development for "in-house" audit team members**

## Drivers

- **EO 13423 (2007)**

- **EPA Letter recommending self-assessments (1986)**

- **DODI 4715.5 OCONUS**

- **DODI 4715.6 CONUS**

- **AR 200-1 (2007)**

**This brief only addresses Active Army program.**

# Program History
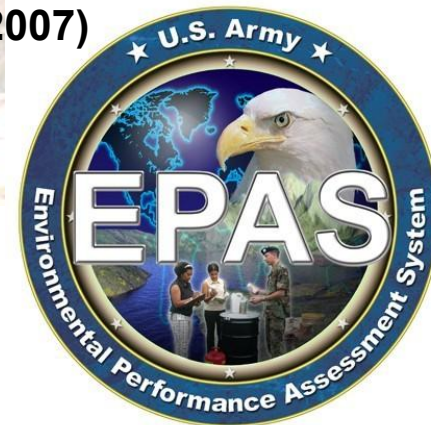
| Year | Event | Description |
|------|-------|-------------|
| 1985 | EPA Policy | Encouraged voluntary environmental compliance self-audits. |
| 1991 | HQDA | Established Environmental Compliance Assessment Program (ECAS). Required external and internal compliance assessments. |
| 1997 | AR 200-1 | Allowed Installation Status Report (ISR), Part II to be substituted for internal assessments. |
| 2000 | EO 13148 | Required an EMS program and EMS audits. |
| 2002 | ACSIM/DEP | ECAS changed to EPAS, EMS included in assessment Program. Rescinded ISR Part II substitution policy of 1997 AR 200-1, Internal Assessments required. |
| 2006 | ACSIM/DEP downward adjustments | OA22 14% tax, and DEP directed major reduction in level of effort for on-site EPAS audits. |
| 2007 | Program Rebuilding | Rebuilding program to Sustainability paradigm through stakeholder involvement (HQDA, ACOMS, IMCOM, installations, OCONUS reps). |
| 2008 | Paradigm Shift | Combined EMS and Compliance audits on 3 year cycle. Train in-house audit team member pool. Audit to installations' risk assessment, plus spot checks. Track findings for closure and trends analysis. |
| 2008 | FY 10-15 POM Build | First time EPAS is built into the POM. |
| 2010 | Full Coverage | Full funding expected; audit all compliance media + EMS. |

# Challenges since 2006

- **Funding for EPAS**
- **Audit planning paradigm shift**
- **Immature environmental management systems**
- **Minimizing disruptions to installation operations while simultaneously providing quality audits**
- **Managing assignments and qualified auditor pool**
- **Funding issuance process (GFEBS Implementation)**
- **Audit documentation software tool**

# Improvements

- **Lean Six Sigma Projects Completed**
  - Multiple projects
  - Various aspects of EPAS
  - Stakeholder participation on teams
  - Documented products guiding improvements
- **Funding Challenges Addressed through POM Process**
- **Compliance Media Risk Model Developed and Implemented**
- **Process Flow Diagrams Developed**
- **Army Regulation, Guidance Documents, SOPs, and Templates Updated and/or Developed**
- **Improved Coordination in Planning Actions, Ensuring Leadership Concurrence/Awareness**
- **AKO EPAS Stakeholders Page Established**
- **AKO Knowledge Centers Established for each scheduled audit**

# EPAS Process

- **Plan for upcoming FY**
  - Budget
  - Schedule
  - Scope (risk analysis)
  - Assignments (people)
- **Execution**
  - Training
  - Execute audits
  - Review/finalize findings
- **Programmatic Review**
- **Trends analysis**
- **Tracking**
  - Compliance findings
  - EMS conformance

# Auditing Actions

## Compliance _and_ EMS Audit

- **Trained and experienced auditors develop an audit plan to**
    - Review documents and records
    - Interview staff at all levels
    - Observe operations
- **Installation kept informed of findings as site visit progresses**

## Compliance Audit

- **Ensure compliance with legal and regulatory drivers**
- **Auditors audit the compliance media against the**
    - Federal Protocols
    - State Protocols
    - Final Governing Standard Protocols
    - Army Protocols
- **Findings are documented in**
    - AEDB-EPAS (CONUS) [AR 200-1 requirement for all]
    - Access database (OCONUS external audits)
- **Recommend Corrective Actions for all negative findings**
- **Garrison Commander (GC) exit briefed by EPAS Audit Team Leader** (external audits)

## EMS Audit

- **Ensure the management system is complete and effective**
- **Auditors audit an EMS against the**
    - ISO 14001:2004 Standard
    - Installation's own commitments and procedures established under their EMS (i.e. are they doing what they said they would do?)
    - Army Policy
- **Findings are documented in a Word report** (external audits)
- **ISO 14001 conformance is determined by the Lead EMS Auditor**
    - Non-conformant = 1 or more major findings and/or a significant number of minor findings
- **Lead EMS Auditor may accompany EPAS Audit TL on GC exit brief** (external audits)

# Finding Categories

- **Compliance Findings**

  - **Class I**:  Noncompliance with existing Federal, State or local regulation, or noncompliance with future regulatory requirement (effective within next 6 months)

  - **Class II**:  Noncompliance with future regulatory requirement (effective in 6 months to 2 years)

  - **Class III**:  Noncompliance with Army/DoD regulation, SOP, or guidance, or inconsistent with good management practice

  - **Positive**:  Above and beyond regulatory requirements

- **EMS Findings**

  - **Conformance**:  management system conforms to ISO 14001 standard

  - **Major Nonconformance**: EMS is missing  element of standard or has systemic problem;

  - **Minor Nonconformance**:   EMS conforms with minor exception

  - **Observation**:  Optional comment

# Pros & Cons of Simultaneous Audits

- **Pros**
  - Single site visit
  - On-site collaboration between EMS and compliance auditors
  - Improves understanding of EMS and compliance media management relationship

- **Cons**
  - Larger team size
  - EMS auditors have less evidence that the system works, before site visit (e.g., compliance audited and corrective actions implemented)
  - Compliance auditors not aware of systemic management problems, if any, before site visit

# INSTALLATION MANAGEMENT COMMAND



## *"Sustain, Support and Defend"*